



**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

GEP ADMINISTRATIVE SERVICES, LLC
D/B/A ENTERTAINMENT PARTNERS,

Plaintiff,

v.

MELISSA WISEMAN,

Defendant.

Case No.: 3:24-CV-00256
JUDGE RICHARDSON

JOINT MOTION FOR AGREED PROTECTIVE ORDER

Plaintiff GEP Administrative Services, LLC, d/b/a Entertainment Partners (“Plaintiff”) and Defendant Melissa Wiseman (“Defendant”) (together, the “Parties”), by and through their undersigned counsel, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure respectfully request the Court to grant their Joint Motion for Agreed Protective Order. In support, the Parties show the Court:

1. The Agreed Protective Order (“Protective Order”), attached as ***Exhibit A***, is necessary to protect proprietary, confidential, competitive, trade secrets, and/or private documents and information that may be produced and/or otherwise disclosed during the course of discovery and other proceedings in this action and is referenced in Paragraph 9 of the Forensic Examination Protocol (D.E. 18-13) that the Court found aligned with the Preliminary Injunction with the exception noted in footnote 5 of the Court’s June 11, 2024 Order (D.E. 27, at p. 12).

2. The undersigned counsel certify that, pursuant Rule 26(c) of the Federal Rules of Civil Procedure, they have conferred with each other and agreed to entry of this Agreed Protective Order.